

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. : 04-10375-RWZ
MICHAEL PRIDGEN)

DEFENDANT'S MOTION IN LIMINE TO PROHIBIT
REFERENCE TO "FELON"

Defendant Michael Pridgen respectfully moves that this Court and the government refer to the prior conviction that is an element of 18 U.S.C. § 922(g)(1) as one "punishable by imprisonment for more than one year," rather than as a "felony conviction," and further moves that the charge against him not be described as that of being a "felon" in possession of a firearm.

As ground for this motion, defendant submits that the word "felon" may have pejorative connotations to the jury beyond the simple statutory requirement.

Respectfully submitted
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 22, 2006.

/s/ Page Kelley
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